

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AARON SIEGEL;

JASON COOK;

JOSEPH DELUCA;

NICOLE CUOZZO;

TIMOTHY VARGA;

CHRISTOPHER STAMOS;

KIM HENRY; *and*

ASSOCIATION OF NEW JERSEY
RIFLE & PISTOL CLUBS, INC.,

Plaintiffs,

v.

MATTHEW PLATKIN, in his official
capacity as Attorney General of New
Jersey,

PATRICK J. CALLAHAN, in his
official capacity as Superintendent of the
New Jersey Division of State Police,

Defendants.

Civil Action No. 1:22-cv-07463-
KMW-AMD

CIVIL ACTION

(ELECTRONICALLY FILED)

**DECLARATION OF JASON COOK IN SUPPORT OF
PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

1. I, Jason Cook, am a plaintiff in the above-titled action. I am over the age of 18, have personal knowledge of the facts and events referred to in this Declaration, and am competent to testify to the matters stated below.

2. I am a law-abiding resident and citizen of the United States and the State of New Jersey. I reside at 15 Railroad Street, Brown Mills, New Jersey 08015. I am a member of Association of New Jersey Rifle & Pistol Clubs, Inc.

3. I am the general manager of a pharmacy in Willingboro, New Jersey.

4. I am a firearm owner and Handgun Carry Permit holder because I believe that possession and carry of firearms is an important aspect of protecting myself from the risk of violent crime.

5. I obtained my Handgun Carry Permit because I recognize that violent crime can take place anywhere, including when I am outside the home.

6. In particular, I am concerned about the area where I work, which is an area that experiences elevated levels of crime.

7. Prior to the passage of A4769, on several occasions, I lawfully carried my handgun at medical appointments, but only those medical appointments that did not require that I disrobe so that I could maintain safe possession and control of my handgun at all times.

8. Several times per month, I enjoy walking trails in State parks, and during the summer, I enjoy walks or fishing at the public beaches in Seaside, Avon, Belmar, Point Pleasant, and Manasquan New Jersey.

9. Because my grandparents lived in Union County, I have spent a great deal of time in Union County over the years. I currently still enjoy spending time at Galloping Hill Park in Kenilworth several times per year.

10. I have a one year old nephew. When my nephew is older, I will take my nephew to playgrounds near my home.

11. Several times per year, I enjoy the Popcorn Park Zoo in Forked River, New Jersey, the Adventure Aquarium in Camden, New Jersey, and Jenkinson's Aquarium in Point Pleasant Beach, New Jersey.

12. I go to movie theatres and the Medieval Times theatre from time to time. I also attend concerts at the Prudential Center in Newark, New Jersey, the PNC Bank Arts Center in Holmdel, New Jersey, and the BB&T Pavilion in Camden, New Jersey.

15. Once per month, I enjoy trips to the casinos in Atlantic City, New Jersey. When I do so, I enjoy gambling on the casino floors, dining in the casino restaurants, attending shows in the casino theatres, and staying in the casino hotels.

16. I attend races several times per year at Atco Dragway racetrack in Waterford Township, New Jersey.

17. I enjoy dining out at restaurants. Some of these restaurants have a license to serve alcohol.

18. At least once per month, I drive my family members and drop them off or pick them up at Newark Airport or Atlantic City Airport.

19. I enjoy snowboarding and skiing. Every few years, I travel to New Hampshire and am planning a trip to Utah next year for these activities.

20. I am licensed to carry a handgun in both New Hampshire and Utah, and on some of these trips, I will fly and wish to bring my handgun with me to carry for protection. If I brought my handgun with me during air travel, I would declare my handgun unloaded and properly cased and packed at the airline ticket counter as required by federal law.

21. I regularly drive a car but also regularly ride a motorcycle.

22. From time to time, I take professional education classes for work. I also take firearm training classes, and motorcycle classes from time to time.

23. From time to time, I attend or passes within 100 feet of public gatherings and events, but I generally do not know which ones require a government permit.

24. Anyone can encounter a place where motion picture or television images are being made while out in public, including television news coverage. I have done so multiple times in the past, and in each instance I approached the

location to inquire about the production and to determine if I recognized any of the actors or personalities involved. I would again in the future approach such locations in the same manner if I encountered them to see what film or television show was being filmed.

25. I am a private homeowner. I would allow the carry of handguns on my property, but I do not want to have to post a sign on my property explicitly saying so.

26. I would carry my handgun in all of the foregoing places and would carry my handgun loaded and on my person in my car and on my motorcycle but I refrain from doing so for fear of arrest and prosecution.

27. I refrain because of the prohibition on carry within 100 feet of public gatherings set forth in A4769 section 7(a)(6).

28. I refrain because of the prohibition on carry at zoos set forth in A4769 section 7(a)(9).

29. I refrain because of the prohibition on carry at parks, beaches, recreation facilities or areas, and playgrounds set forth in A4769 section 7(a)(10) and the designation by Union County of Galloping Hill Park as a gun free zone.

30. I refrain because of the prohibition on carry at restaurants and other locations where alcohol is served set forth in A4769 section 7(a)(15), even though I would not consume alcohol at these locations while carrying my handgun.

31. I refrain because of the prohibition on carry at entertainment facilities set forth in A4769 section 7(a)(17).

32. I refrain because of the prohibition on carry in casinos and related facilities set forth in A4769 section 7(a)(18) and N.J.A.C. 13:69D–1.13.

33. I refrain because of the prohibition on carry at airports and public transportation hubs set forth in A4769 section 7(a)(20), even though I would not carry my handgun in the sterile/secure areas of any airport.

34. I refrain because of the various prohibitions on carry in medical and medical type facilities set forth in A4769 section 7(a)(21) and (22).

35. I refrain because of the prohibition on carry at public film and television locations set forth in A4769 section 7(a)(23).

36. I refrain from carrying at professional education classes, firearm classes, and motorcycle classes because of the prohibition on carry at a “school, college, university or other educational institution” set forth in A4769 section 7(a)(7).and N.J.S. 2C: 39-5(e) because I am unsure if those qualify as a “school, college, university or other educational institution” within the meaning of those sections because those terms are vague and those statutes do not define those terms.

37. I refrain from carrying my handgun loaded and on my person in my car because of the prohibition on doing so in a vehicle set forth in A4769 section 7(b)(1).

38. I also refrain from carrying my handgun on my motorcycle at all because the term “vehicle” set forth in A4769 section 7(b)(1) is vague and undefined, and I am unsure whether I may lawfully do so on my motorcycle. Section 7(b)(1) requires that a handgun be unloaded and contained in a closed and securely fastened case, gunbox, or locked unloaded in the trunk of a vehicle, and none of those measures are possible on my motorcycle.

39. I also refrain because of the prohibition on carry on private property set forth in A4769 section 7(a)(24). Some of the foregoing places are private property, and none of the owners of the private property on which I would otherwise carry has provided express consent or has posted the required sign granting permission.

40. As a result of the foregoing prohibitions, I can carry my handgun virtually nowhere outside my home.

41. I also intend to apply for additional Permits to Purchase and therefore will be subject to the new requirements of N.J.S. 2C:58-3.

I declare under penalty of perjury that the foregoing is true and correct.
Executed within the United States.

Jason Cook
Jason Cook

12/22/2022
Date